

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DONALD AND MARY MOREAUX,  
Individually and on Behalf of all Others  
Similarly Situated,

Plaintiff,

vs.

LINCOLN EDUCATIONAL SERVICES  
CORP., DAVID F. CARNEY, SHAUN E.  
McALMONT and CESAR RIBEIRO,

Defendants

2:10-cv-04160-SRC-MAS

ROBERT LYATHAUD, Individually and on  
Behalf of all Others Similarly Situated,

Plaintiff,

vs.

LINCOLN EDUCATIONAL SERVICES  
CORP., DAVID F. CARNEY, SHAUN E.  
McALMONT and CESAR RIBEIRO,

Defendants

2:10-cv-04926-SDW-MCA

**RICHARD ARONS' NOTICE OF  
MOTION TO CONSOLIDATE CASES, BE APPOINTED  
AS LEAD PLAINTIFF AND FOR APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE that class member Richard Arons ("Movant") hereby moves this Court pursuant to Fed. R. Civ. P. 42(a), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, at the United States District Court for the Western District of Pennsylvania, located at Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, 07101, on November 15, 2010, for an Order: (a) consolidating the related actions; (b) appointing Movant to serve as lead plaintiff; and (c) approving Movant's selection of lead counsel for the class.

In support of his motion, Movant submits: (a) the Declaration of Joseph R. Seidman, Jr., dated October 15, 2010, and annexed exhibits; (b) a Memorandum of Law, dated October 15, 2010; and (c) a Proposed Order granting Movant's motion for consolidation of related cases, appointment as lead plaintiff and approval of his selection of lead counsel for the Class.

Dated: New York, New York  
October 15, 2010

**JAN MEYER & ASSOCIATES, P.C.**

/s/

---

Jan Meyer  
Solomon Rubin  
1029 Teaneck Road, 2nd Floor  
Teaneck, NJ 07666

**BERNSTEIN LIEBHARD LLP**  
U. Seth Ottensoser  
Joseph R. Seidman, Jr.  
10 East 40th Street - 22nd Floor  
New York, New York, 10016  
(212) 779-1414

33317v1

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served upon the following counsel of record in the action filed in this Court by ECF on October 15, 2010:

SAMUEL L. DAVIS  
DAVIS, SAPERSTEIN & SALOMON, PC  
375 CEDAR LANE  
TEANECK, NJ 07666

/s/

---

JOSEPH R. SEIDMAN, JR.